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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LAURA LEIGH, et al.,
Plaintiffs,

v.

JON RABY, et al.
Defendants.

Case No: 3:22-cv-00034-MMD-CLB

**THIRD JOINT STIPULATION TO
EXTEND THE DEADLINE FOR
FILING A MOTION FOR
ATTORNEYS' FEES AND COSTS**

Pursuant to Local Rule IA 6-1, Plaintiffs Animal Wellness Action, Cana Foundation, the Center for a Humane Economy, Laura Leigh, and Wild Horse Education, and Defendants United States Department of the Interior, Bureau of Land Management ("BLM"), and Jon Raby, in his official capacity as Nevada State Director of the BLM, (collectively, the "Parties"), by and through their undersigned counsel, hereby stipulate and respectfully request that the Court extend the time to file any motions related to attorneys' fees and costs 60 days, until October 11, 2024. In support of this request, the Parties declare:

1 WHEREAS, on March 28, 2024, the Court issued an opinion and order on the Parties'
2 cross-motions for summary judgment. ECF No. 81.

3 WHEREAS, on March 29, 2024, judgment was entered by the Clerk of the Court. ECF
4 No. 82.

5 WHEREAS, on April 10, 2024, the parties filed a joint stipulation to extend the time
6 needed to explore the settlement of attorneys' fees and costs. ECF No. 83.

7 WHEREAS, on April 11, 2024, the Court granted the parties' joint stipulation. ECF
8 No. 84.

9 WHEREAS, on June 5, 2024, the parties filed a second joint stipulation to extend the
10 time needed to explore the settlement of attorneys' fees and costs. ECF No. 87.

11 WHEREAS, on June 6, 2024, the Court granted the parties second joint stipulation. ECF
12 No. 88.

13 WHEREAS, the Parties remain interested in and are working cooperatively towards
14 settlement. The Parties agree that their resources are best devoted to continuing settlement
15 discussions for reasonable fees and costs rather than litigation. This proposed extension of
16 time is necessary to allow the Parties to continue to discuss a negotiated resolution and, if an
17 agreement in principle is reached, to draft the necessary settlement documents and obtain
18 required approvals from approving officials within the Department of Interior and the
19 Department of Justice.

20 WHEREAS, this is the third stipulation for an extension of time to file a motion for
21 attorneys' fees and costs.

22 WHEREAS, it is well-established that the court has the inherent power to "control the
23 disposition of the causes on its docket with economy of time and effort for itself, for counsel,
24 and for litigants." *Landis v. North Am. Co.*, 299 U.S. 248, 254 (1936); *CMAX, Inc. v. Hall*,
25 300 F.2d 265, 268 (9th Cir. 1962); *Leyva v. Certified Grocers of California*, 593 F.2d 857,
26 863-64 (9th Cir. 1979).

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1 NOW, THEREFORE, IT IS STIPULATED BY AND BETWEEN THE PARTIES,
2 AND THE COURT ORDERS, AS FOLLOWS:

- 3 1. Upon entry of the Court's order, the deadline to file any motion for attorneys' fees
4 and costs is extended from August 12, 2024, until October 11, 2024.

5 IT IS SO STIPULATED.

6 Dated: August 1, 2024

Respectfully submitted,

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8 /s/ Danielle M. Holt

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14 /s/ Jessica L. Blome

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/s/ Samantha G. Peltz

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IT IS SO ORDERED:

Hon. MIRANDA M. DU
UNITED STATES DISTRICT JUDGE

DATED: _____

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2024, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the District of Nevada using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system, which includes counsel of record for all parties in the case.

/s/ Jessica L. blome
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Attorney for Defendants

